

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

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WANDA OVALLES, INDIVIDUALLY
AND P.P.A A.O., AND WILSON OVALLES,

Plaintiffs,

- against -

SONY ELECTRONICS INC., BEST BUY CO., INC.,
FOXCONN INTERNATIONAL, INC., AND JOHN
DOE CORPORATIONS 1-4,

Defendants.
-----X

Case No. 3:14-CV-137-M-PAS

**LIMITED OPPOSITION OF SONY ELECTRONICS INC. AND BEST BUY CO, INC.
TO PLAINTIFFS' MOTION FOR ENTRY OF A SCHEDULING ORDER**

The plaintiffs have requested that the court enter a scheduling order. The defendants agree completely that it makes sense for the court to issue a new scheduling order, but do not agree that the deadlines suggested by the plaintiffs are workable or reasonable given the current status of the case. Counsel for the defendants has conferred at length with plaintiffs' counsel since the motion was filed in an effort to reach an agreement so that a joint proposal could be made, but those efforts have proven unsuccessful. Therefore, the defendants request that the court enter an order containing the following deadlines and terms as opposed to those requested by the plaintiffs.

March 17, 2017 – Completion of Fact Discovery.

May 5, 2017 – Service of Plaintiffs' Experts' Reports. Each expert will provide 3 dates during which he or she is available to be deposed between June 12 - August 11, 2017.

June 9, 2017 – Service of Defendants' Experts' Reports. Each expert will provide 3 dates during which he or she is available to be deposed between August 14 - October 13, 2017.

Counsel for the defendants agree to make themselves available to depose the plaintiffs' experts on at least one of the dates provided for each of the plaintiffs' experts identified between June 12 – August 11, 2017.

Counsel for the plaintiffs' agree to make themselves available to depose the defendants' experts on at least one of the dates provided for each of the defendants' experts identified between August 14 – October 13, 2017.

The depositions will take place in the geographic area where the experts reside or work unless otherwise agreed by the parties. No deposition shall last longer than 7 hours of on-the-record testimony unless otherwise agreed by counsel and the witness. The party taking the deposition will bear the cost for the witness's time spent at the deposition, but not for anything else such as time spent traveling or preparing for the deposition.

October 13, 2017 – Completion of Expert Depositions.

TBD – Trial date, summary judgment motions and other pretrial filings.

Counsel for the defendants look forward to the Scheduling Conference on December 7, 2016 to discuss their proposal further with the court.

SONY ELECTRONICS INC & BEST BUY CO.,
INC.,
By its attorneys,

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CERTIFICATION

I hereby certify that on this 2nd day of December, 2016, a true copy of the within document was served electronically through the ECF system to:

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